

**ATTACHMENT 1**

UNITED STATES DISTRICT COURT  
NORTHER DISTRICT OF OHIO

Carlos Berry,	)	CASE NO.: 1:24CV1731
	)	
	)	
Plaintiff(s),	)	
	)	JUDGE PATRICIA A. GAUGHAN
	)	
vs.	)	
	)	<b><u>REPORT OF PARTIES' PLANNING</u></b>
HAZA Foods of Northeast, LLC.,	)	<b><u>MEETING UNDER FED. R. CIV.P.</u></b>
	)	<b><u>26F), L.R.16.3 (b)(3) AND LPR 2.1</u></b>
	)	
Defendant (s).	)	

1. Pursuant to Fed. R. Civ. P. 26 (f) and L.R. 16.3 (b), a meeting was held on  
December 13 \_\_\_\_\_, 202<sup>4</sup>\_\_\_\_\_, and was attended by:

Kevin M. Gross	Counsel for plaintiff (s)	Carlos Berry
_____	Counsel for plaintiff (s)	_____
Scott Coghlan	Counsel for defendant(s)	HAZA Foods of Northeast, LLC
_____	Counsel for defendant(s)	_____

2. The parties:

☐ have exchanged the pre-discovery disclosures required by Rule 26 (a) (1)

☒ will exchange such disclosures by December 30 \_\_\_\_\_, 202<sup>4</sup>\_\_\_\_

☐ have not been required to make initial disclosures.

3. The parties recommend the following track:

☐ Expedited                      ☒ Standard                      ☐ Complex  
☐ Administrative                      ☐ Mass Tort

4. This case is automatically designated as suitable for Electronic Case Filing (ECF). Is there any reason that the designation should change to “not suitable for ECF”? No.

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5. Choose one of the following:

☐ This case **is** suitable **now** for **ADR** or \_\_\_\_\_ (insert an alternative ADR).

or,

☒ Case **is not** suitable for ADR at this time.

or,

☐ Case **is not** suitable for ADR at any time.

6. The parties ☐ do/ ☒ do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S. C. § 636 (c).

7. Federal jurisdiction is based upon 28 U.S.C. § 1331 and 28 U.S.C. § 1343.

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8. Recommended Discovery Plan:

- a) Describe the claims & defenses on which discovery is to be sought and the nature and extent of discovery.

Title VII discrimination claims based on religion and race.

Written discovery followed by depositions.

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- b) Non-Expert discovery deadline: May 31, 2025
- c) If applicable, set forth the issues that will be addressed by experts and provide proposed deadlines: None anticipated at this time.
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Expert report for the party with the burden of proof deadline: \_\_\_\_\_

Rebuttal expert report deadline: \_\_\_\_\_

Expert discovery cut-off deadline: \_\_\_\_\_

9. The pleadings shall be amended **without** leave of Court on or before: January 31, 2025.
10. Recommended dispositive motion date: June 30, 2025.
11. Recommended date for a Status Conference April 14, 2025 or Settlement Conference August 25, 2025.
12. Other matters for the attention of the Court: None at this time.
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Attorney for Plaintiff (s) /s/ Kevin M. Gross (0097343)

Attorney for Plaintiff (s) \_\_\_\_\_

Attorney for Plaintiff (s) \_\_\_\_\_

Attorney for Defendant(s) /s/ Scott Coghlan (0059856)

Attorney for Defendant(s) \_\_\_\_\_

Attorney for Defendant(s) \_\_\_\_\_